

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

TEXARKANA DIVISION

MOISES SANDOVAL MENDOZA	:	
	:	CIVIL ACTION
v.	:	
	:	No. 5:09-CV-00086 (RWS)
NATHANIEL QUARTERMAN,	:	
Director, Texas Dept of Criminal Justice,	:	
Correctional Institutions Division	:	
_____	:	

MOTION FOR  
PERMISSION TO TRAVEL

Comes now the undersigned, JEFFREY L. ERTEL, counsel for MOISES SANDOVAL MENDOZA, Petitioner in the above-styled action, and moves this Court to grant him permission to travel from Fort Myers, Florida to Houston, Texas March 25 to March 28, 2025 to meet with Mr. Mendoza and interview potential clemency witnesses. In support of this Motion, Mr. Ertel shows as follows:

(1)

From June 21 to June 29, 2005, Mr. Mendoza was tried, convicted and sentenced to death by a jury sitting in Collin County, Texas.

(2)

Mr. Mendoza pursued a direct appeal as well as state and federal habeas corpus relief.

(3)

After he had exhausted all potential avenues of relief, Mr. Mendoza filed a Motion to Appoint Counsel, Jeffrey L. Ertel, pursuant to 18 U.S.C. § 3599(d), to pursue “proceedings following the conclusion of federal habeas corpus review, such as ‘applications for stays of executions and other appropriate motions.’ As well as ‘proceedings for executive clemency or other clemency as may be available to the defendant.’” (Doc. 136 at 3).<sup>1</sup>

(4)

On January 8, 2025, this Court entered an order appointing Mr. Ertel. (Doc. 137).

(5)

Thereafter, and in compliance with this Court’s order, Mr. Ertel entered his notice of appearance on January 14, 2025.

(6)

Mr. Ertel seeks permission to travel from his home in Fort Myers, Florida to Houston Texas from March 25 to March 28, 2025 so he can meet with Mr. Mendoza, meet with Mr. Mendoza’s family, and locate and interview potential clemency witnesses.

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<sup>1</sup> Prior to the filing of this Motion, the state court set April 23, 2025, as the day that Mr. Mendoza is to be executed.

(7)

Mr. Ertel believes the approximate costs associated with this trip will be as follows:

Round trip airfare (Delta)	600.00
Hotel	450.00
Rental Car	300.00
Meals	320.00
Gasoline	<u>150.00</u>
Total	1,920.00

WHEREFOR, Mr. Ertel requests this Court approve his request for travel and accommodations from March 25 to March 28, 2025.

Dated, this the 17<sup>th</sup> day of March, 2025.

Respectfully submitted,

/s/ Jeffrey L. Ertel

JEFFREY L. ERTEL

State Bar No. 249966

COUNSEL FOR MR. MENDOZA

**THE MENDELSON ERTEL LAW GROUP, LLC**

101 Marietta Street, NW

Suite 3325

Atlanta, GA 30303

(404)885-8878

(fax) (470) 826-1755

[jeffrey@tmelg.com](mailto:jeffrey@tmelg.com)